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 Daniel Rose, M.D.,
 Daniel Rose, M.D. as President of
 Memory Rehabilitation Medical Group
 a Professional Medical Corporation.

**UNITED STATES BANKRUPTCY COURT
 FOR THE EASTERN DISTRICT OF CALIFORNIA
 SACRAMENTO DIVISION**

In re:)	Case No. 20-24783-A-11
)	DCN: RLC-1
Gregory F. Smith, M.D.)	Date: May 17, 2021
A Professional Corporation,)	Time 1:30 p.m.
)	Dept: A
Debtors)	Ctrm: 28
)	Judge: Frederick E. Clement

**DECLARATION OF STEPHEN M. REYNOLDS IN
 SUPPORT OF MOTION TO WITHDRAW AS COUNSEL**

Local Rule of Practice 2017-1(e)

I, Stephen M. Reynolds, am an attorney admitted before this Court. I am familiar with the content of this Declaration and if called to testify could and would provide competent testimony thereto. Counsel believes that communication between Counsel and Clients has broken down and he is unable to provide effective representation.

1. In consultation with the clients I filed a proof of claim, responded to discovery and communicated with counsel for the debtor and former counsel for Dr. Gregory Smith.
2. My representation has become unreasonably difficult because my clients have not met the requirements of our representation agreement. I have made repeated requests that the problems be addressed but the problems continue. Under the circumstances it is unreasonable difficult to represent these clients.
3. I have taken reasonable steps to avoid foreseeable prejudice to my clients including

1 setting this motion on 28 days' notice to allow them to obtain substitute counsel.


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3 Pursuant to 28 USC §1746, I hereby declare under penalty of perjury under the laws of the United
4 States of America that the foregoing is true and correct. Executed this 7th day of April, 2021.

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/s/ Stephen M. Reynolds
Stephen M. Reynolds

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